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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF BEATRICE BADER; TRUST  
CREATED UNDER THE LAST WILL AND  
TESTAMENT OF BEATRICE BADER; JAMES  
DOYLE, in his capacity as trustee of the Trust  
Created Under the Last Will and Testament of  
Beatrice Bader; and STUART ZLOTOLOW, in his  
capacity as executor of the Estate of Beatrice Bader  
and as former trustee of the Trust Created Under the

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04815 (SMB)

Last Will and Testament of Beatrice Bader,  
Defendants.

**STIPULATION AND ORDER**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Defendants Estate of Beatrice Bader, Trust Created Under the Last Will and Testament of Beatrice Bader, James Doyle, in his capacity as trustee of the Trust Created Under the Last Will and Testament of Beatrice Bader, and Stuart Zlotolow, in his capacity as executor of the Estate of Beatrice Bader and as former trustee of the Trust Created Under the Last Will and Testament of Beatrice Bader (collectively, the “Defendants”) represent as follows:

**WHEREAS**, on November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “LPO”) [Adv. Pro. No. 08-01789 (SMB), Dkt. 3141];

**WHEREAS**, the Trustee commenced this action (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) on December 1, 2010 [Dkt. 1];

**WHEREAS**, Defendants filed an answer to the Complaint on April 17, 2014 [Dkt. 25];

**WHEREAS**, pursuant to the Notice of Applicability filed by the Trustee in this Adversary Proceeding on December 2, 2010 [Dkt. 2], the LPO and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter;

**WHEREAS**, under the Avoidance Procedures, “the parties shall meet, either in person or by teleconference, and confer on a mediation, discovery and litigation plan (the ‘Initial Case

Conference')” within 30 days after the last defendant files an answer to the Complaint (the “Initial Case Conference Period”);

**WHEREAS**, the Trustee filed a Notice of Voluntary Dismissal Without Prejudice of Defendant Ann Bader Geller on June 2, 2014 [Dkt. 27], and as a result, all Defendants have filed an answer to the Complaint;

**WHEREAS**, the Trustee and Defendants have agreed to extend the Initial Case Conference Period in this Adversary Proceeding, which would otherwise have ended on September 8, 2014; and

**WHEREAS**, nothing in this Stipulation is a waiver of the Defendants’ right to request from the Court (and the Trustee’s right to object to any such request), or the parties’ rights to agree to, a further extension the Initial Case Conference Period.

**NOW, THEREFORE**, the Parties stipulate and agree to, and the Court **ORDERS**, that the Initial Case Conference Period is hereby extended to October 10, 2014.

Dated: September 3, 2014  
New York, New York

**BAKER & HOSTETLER LLP**

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*Attorneys for Defendants*

SO ORDERED ON September 4<sup>th</sup>, 2014:

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE